



333 EARLE OVINGTON BOULEVARD, SUITE 402
UNIONDALE, NEW YORK 11553
T: 516-203-7600
F: 516-282-7878

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 5/6/2025

May 5, 2025

VIA ECF

Hon. Mary Kay Vyskocil, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

Re: *Ulices Rames v. Irina Valeryevna Shaykhislamova*,
Case No. 1:24-cv-03729-MKV

Dear Judge Vyskocil:

We represent plaintiff Ulices Rames ("Plaintiff") in the above captioned action. Pursuant to Paragraphs 2(B) and 2(G) of Your Honor's Individual Rules of Practice in Civil Cases, Plaintiff respectfully requests an adjournment of the May 13, 2025, Default Judgment Hearing to a date thereafter that is convenient for the Court.

In support of this Motion, Plaintiff includes the following:

- (1) The Court has ordered the parties to appear at a hearing scheduled before Your Honor for May 13, 2025, at 11:00 a.m. (*Dkt. No. 23*) to discuss Plaintiff's motion for default judgment (*Dkt. Nos. 17-21*) as to defendant Irina Valeryevna Shaykhislamova ("Defendant");
- (2) This is Plaintiff's second request for an adjournment and/or extension of time and the Court's granted Plaintiff's first request for an extension of time (*Dkt. No. 15*) via the Court's August 8, 2024, Order (*Dkt. No. 16*);
- (3) Plaintiff makes the instant request due to an unforeseen scheduling conflict with the hearing currently scheduled before Your Honor;
- (4) As Defendant has yet to formally appear with respect to this matter, there is no party with which Plaintiff can inquire as to their consent to this request.

The instant request is made in good faith and granting the requested adjournment will not prejudice any party to this matter. Thank you for your consideration of this request.

Respectfully submitted,


/s/ Joshua D. Vera

Joshua D. Vera

Counsel for Plaintiff

The Court scheduled the May 13, 2025 default hearing nearly two weeks ago. [ECF No. 23]. Plaintiff served notice of the default judgment on Defendant hearing nearly a week ago. [ECF No. 24]. Now, Plaintiff notifies the Court of an undisclosed and "unforeseen scheduling conflict." The Court's schedule does not allow for an adjournment of this hearing. Accordingly, Plaintiff's request to adjourn the hearing is HEREBY DENIED. The parties may appear telephonically by dialing 646-453-4442 and entering access code 792277740#. On or before May 9, 2025, Plaintiff shall notify the Court if he intends to appear telephonically, serve this order on Defendant, and file a certificate of service on the docket.
SO ORDERED.

Date: May 6, 2025
New York, New York


Mary Kay Vyskocil
United States District Judge